

# OFFICE OF THE AGRICULTURAL COMMISSIONER

Tony Linegar  
Agricultural Commissioner  
Sealer of Weights and Measures



133 Aviation Boulevard, Suite 110  
Santa Rosa, CA 95403-1077  
(707) 565-2371 Fax (707) 565-3850  
[www.sonoma-county.org/agcomm](http://www.sonoma-county.org/agcomm)

February 1, 2013

Ms. Sandi Potter, Water Resources Control Engineer  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, California 94612  
**VIA EMAIL: [SMPOTTER@WATERBOARDS.CA.GOV](mailto:SMPOTTER@WATERBOARDS.CA.GOV)**

Dear Ms. Potter:

I appreciate this opportunity to provide comments on the proposed Conditional Waiver of Waste Discharge Requirements for Eligible Vineyard Properties in the Napa River and Sonoma Creek Watersheds.

In 2000, Sonoma County adopted the Vineyard Erosion and Sediment Control Ordinance (VESCO), and in 2006 published the associated *Best Management Practices Handbook*. This ministerial process was put in place to ensure that new vineyard and orchard development and replants in Sonoma County would be done in a way that would control water quality impacts from erosion, and minimize sediment delivery to fish bearing streams. Since its inception in 2000, VESCO and the associated *Best Management Practices* have dramatically improved farming practices and environmental quality in Sonoma County.

As the enforcing agency for VESCO, this department has had the opportunity to work with many landowners over the years to develop erosion control plans that meet the standards of the ordinance and follow the *Best Management Practices*. Through this relationship, we have greatly increased the awareness of landowners on appropriate measures they may take to protect water quality. As a result, many landowners have chosen to voluntarily implement further practices to protect water quality on lands that they farm. This initiative is further evidenced by the fact that many growers voluntarily join other organizations for the purpose of minimizing the impacts of farming on the environment and adopting measures to assure that their farming practices are sustainable. There are many great examples of these types of programs, such as Fish Friendly Farming, the Code of Sustainable Winegrowing Alliance (CSWA), and the associated Certified California Sustainable Winegrowing (CCSW).

I believe that successful administration of the proposed conditional waiver must recognize the efforts that many growers have already made to protect water quality through their involvement in the aforementioned programs. This will help streamline the path to compliance for many growers and facilitate the accomplishment of the water quality objectives in the conditional waiver. It is in this spirit that the Agricultural Commissioner's office will be developing a proposal to submit to the Water Board to become a Third Party Technical Assistance Group. In addition to recognizing the VESCO standards that have been implemented in this regard, we have also been working with the California Sustainable Winegrowing Alliance (CSWA), a 501(c)(3) nonprofit organization incorporated in 2003 by Wine Institute and the California Association of Winegrape Growers (CAWG) and their Code of Sustainable Winegrowing (Code) to develop a path to compliance using the Code as the basis for development of a Farm Water Quality Plan. Using this tool, we believe that we can create an approach that satisfies the water quality objectives of the conditional waiver in a way that is user friendly and engages the grower in the process through the use of the "self assessment" tool. Details of this program are currently under development and will be submitted as part of our forthcoming application to be approved as a Third Party Technical Assistance Group.

I wanted to take this opportunity to share with you my enthusiasm for this unique collaboration between the Sonoma County Agricultural Commissioner's office and the California Sustainable Winegrowing Alliance, and assure you that we will be committed to working with the Water Board to achieve successful implementation of the proposed conditional waiver.

Sincerely,

A handwritten signature in black ink that reads "Tony Linegar". The signature is written in a cursive, flowing style.

Tony Linegar  
Agricultural Commissioner  
County of Sonoma